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9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA
11 WESTERN DIVISION
12

13 **MINDS, INC., et al.,**

14 Plaintiffs,

15 v.

16 **ROBERT BONTA, IN HIS**
17 **OFFICIAL CAPACITY AS**
18 **ATTORNEY GENERAL OF**
CALIFORNIA,

19 Defendant.
20
21

2:23-cv-02705- RGK-MAAx

**DEFENDANT'S NOTICE OF
MOTION AND MOTION TO
DISMISS COMPLAINT**

Date: June 19, 2023
Time: 9:00 am
Courtroom: 10B
Judge: The Honorable R. Gary
Klausner
Trial Date: None set
Action Filed: April 13, 2023

22 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

23 PLEASE TAKE NOTICE THAT at 9:00 a.m. on June 19, 2023, before the
24 Honorable R. Gary Klausner, First Street Courthouse, Courtroom 10B, 350 W. First
25 Street, Los Angeles, CA 90012, Defendant Rob Bonta, in his official capacity as
26 Attorney General of the State of California, will and hereby does move this Court
27 to dismiss without leave to amend Plaintiffs' Complaint for Declaratory and
28 Injunctive Relief pursuant to Federal Rules of Civil Procedure 12(b)(1) and

1 12(b)(6). **This motion is made following the conference of counsel that took**
2 **place on April 26, 2023.**

3 This motion to dismiss is brought on the grounds that Plaintiffs lack standing
4 and their claims are not ripe, and the Complaint fails to state a claim as a matter of
5 law and cannot be cured by amendment. This motion is based on this Notice, the
6 Memorandum of Points and Authorities, the Request for Judicial Notice, the papers
7 and pleadings on file in this action, and upon such matters as may be presented to
8 the Court at the time of the hearing.

9 Dated: May 3, 2023

Respectfully submitted,

10 ROB BONTA
11 Attorney General of California
12 PAUL STEIN
Supervising Deputy Attorney General

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14 /s/ Sharon L. O'Grady
15 SHARON L. O'GRADY
16 Deputy Attorney General
Attorneys for Attorney General, State
of California

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CERTIFICATE OF SERVICE

Case Name: **Minds, Inc., et al. v. Robert
Bonta**

No. **2:23-cv-02705- RGK-MAAx**

I hereby certify that on May 3, 2023, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

- 1. DEFENDANT'S NOTICE OF MOTION AND MOTION TO DISMISS COMPLAINT**
- 2. MEMORANDUM IN SUPPORT OF DEFENDANT'S MOTION TO DISMISS**
- 3. REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF DEFENDANT'S MOTION TO DISMISS WITH EXHIBITS 1-6**
- 4. [PROPOSED] ORDER GRANTING DEFENDANT'S MOTION TO DISMISS COMPLAINT**

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on May 3, 2023, at San Francisco, California.

K. Figueroa-Lee
Declarant


Signature